

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

**In the Matter of

Rural Call Completion**

WC Docket No. 13-39

**REPLY COMMENTS
OF THE MISSISSIPPI PUBLIC SERVICE COMMISSION**

The Mississippi Public Service Commission (“MPSC”) respectfully submits these reply comments in support of the comments filed by state public service commissions and departments from the states of California, Idaho, Indiana, Iowa, Michigan, Minnesota, Nebraska, Ohio, Pennsylvania, South Dakota, Vermont, and West Virginia (“Joint State Commissions”)¹ in response to the Notice of Proposed Rulemaking (“NPRM”) released by the Federal Communications Commission (“FCC”) on February 7, 2013.² In the NPRM, the FCC seeks comment on rules to help address problems in completing long-distance telephone calls to rural customers. The MPSC also supports the approach described by the National Association of Regulatory Utility Commissioners (“NARUC”) in its comments filed in this proceeding, as summarized below.³

¹*See Joint State Commissions Comments* filed on May 13, 2013, by Nebraska Public Service Commission in WC Docket No. 13-39 and DA 13-780.

² *In the Matter of Rural Call Completion*, WC Docket No. 13-39, FCC 13-18, Notice of Proposed Rulemaking (rel. Feb. 7, 2013); Public Notice, DA 13-780 (rel. Apr. 18, 2013).

³ *See Comments of the National Association of Regulatory Utility Commissioners filed on May 8, 2013 in WC Docket No. 13-39.*

In the NPRM, the FCC seeks comment on rules to help address problems in the completion of long-distance telephone calls to rural consumers. The NPRM demonstrates the need for immediate action to provide relief to customers that are attempting to place or receive calls in rural areas, but whose calls are not completed. This is an issue that can seriously impact the lives and livelihood of all rural, suburban, and urban customers as these calls may originate or terminate anywhere in the United States.

The NPRM seeks comment on reporting and data retention requirements. The MPSC agrees with the Joint State Commissions and NARUC that while the NPRM's proposed data collection is a positive step for monitoring the rural call completion problem, collecting data alone is not sufficient to resolve the problem.

In its comments, NARUC asks the FCC to take additional measures beyond collecting data. Those steps include: 1) requiring the industry to track, record, and report the reason for call failure; 2) requiring the industry to provide a timed message alerting the callers that their call is being routed; 3) requiring call path entities to register with the FCC; 4) creating a database for a Single Point of Contact (SPOC) for all call path entities; 5) eliminating safe harbors regarding collection and retention of call failure data; and 6) requiring the reporting of industry standard metrics. In addition, NARUC contends that the FCC should not unilaterally establish permissible call-completion comparison thresholds (ratios) for rural areas for either defining safe harbor provisions or determining enforcement action without forming a factual basis which supports such thresholds.

The MPSC concurs with the Joint State Commissions and NARUC that the FCC has recognized the severity of rural call completion problems and also appreciates the FCC's enforcement actions thus far, including the opening of this rulemaking docket. The MPSC urges

the FCC to expand its rulemaking scope to incorporate NARUC's suggestions to ensure call failure causes are timely identified and either resolved or enforced in a meaningful way.

Respectfully Submitted,

MISSISSIPPI PUBLIC SERVICE COMMISSION

A handwritten signature in blue ink, which appears to read "Brian H. Ray", is written over a horizontal line. Below the signature, the text "Brian Ray, Executive Secretary" is printed.

Brian Ray, Executive Secretary

May 28, 2013